REMARKS

The present Amendment amends claims 13, 16 and 19, and leaves claims 17, 18 and 21 unchanged. Therefore, the present application has pending claims 13, 16-19 and 21.

Preliminary Matters: The Examiner Did Not Examine All of the Previously Presented Claims

Upon a detailed review of the Office Action, Applicants discovered that the Examiner failed to examine previously presented claims 16-19 and 21, while providing detailed reasons for rejecting previously canceled claims 14, 15 and 20. More specifically, the Examiner did not provide reasons for rejecting claims 16-19 and 21 as previously presented in the Amendment filed on February 12, 2010, but appears to have examined these claims using the language recited when previously presented in the Amendment filed on July 29, 2009.

The Examiner appears to have cut and pasted his rejections from the Office Action mailed on November 29, 2009, without any regard to the newly added limitations of the Amendments filed on February 12, 2010 or January 25, 2010. For specific examples of this error, the Examiner's attention is directed to the rejections of claims 19 and 21 on pages 8-13 of the Office Action, where the stated reasons for rejection are exact copies of the stated reasons for rejection as provided in the Office Action mailed on November 29, 2009, even though new substantive limitations for these claims were entered into the record at least on February 12, 2010.

Accordingly, if the Examiner persists in the rejection of the claims, Applicants respectfully request that the Examiner provide reasons for rejecting each of the pending claims 13, 16-19 and 21, while noting that claims 14, 15 and 20 have been canceled. Furthermore, if the Examiner persists in the rejection of the claims, Applicants respectfully request that the Examiner refrain from issuing a <u>final rejection</u>

9

in view of the fact that Applicants have not yet been apprised of the Examiner's

reasons for rejecting all of the pending claims.

Support for Amendments

The amendments are fully supported by the disclosure. For example, the

amendments to the claims are supported by: paragraph 0028 of U.S. Patent

Application Publication No. 2007/0124782 ("Pre-Grant Publication") of the present

application; figs. 2, 10, and 7 (steps 701, 704 and 705); and fig. 9 (steps 901, 902

and 906).

35 U.S.C. §103 Rejections

Claims 13-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable

over U.S. Patent No. 6,618,074 to Seeley et al. ("Seeley") in view of U.S. Patent No.

7,250,964 to Handa ("Handa") and in view of U.S. Patent No. 7,423,670 to Kawai et

al. ("Kawai"). As previously discussed, claims 14, 15 and 20 were canceled in the

Amendment filed February 12, 2010. Therefore, this rejection of claims 14, 15 and

20 is rendered moot.

The rejection of the remaining claims 13, 16-19 and 21 is traversed for the

following reasons. Applicants submit that the features of the present invention, as

now more clearly recited in claims 13, 16-19 and 21, are not taught or suggested by

either of Seeley, Handa or Kawai, whether taken individually or in combination with

each other in the manner suggested by the Examiner. Therefore, Applicants

respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to the claims to more clearly describe features of the

present invention. Specifically, amendments were made to the claims to more

clearly recite that the present invention is directed to an image storage and delivery

method and system as recited, for example, in independent claims 13 and 19.

For example, the combination of Seeley, Handa and Kawai fails to teach or suggest "a delivering step of delivering, by the storage server, image data to the client terminal in IP-packet form, wherein the client terminal requests the image data by specifying a channel and a frame number, wherein in response to an alarm, the storage server performs: a requesting step of requesting the web camera to deliver the second data representative of at least one of the images taken before the alarm occurred, and an alarm recording step of recording the second data from the ring buffer memory in a second recording channel of the disk device with the second image quality along with time stamps without stopping the normal recording step, whereby the recorded second data has a higher frame rate than the first data, and a recording period of the second data and a recording period of the first data overlap in an overlapping period" as recited in claim 13, and as similarly recited in claim 20.

More specifically, the combination of references fails to teach or suggest where in response to an alarm, a step is performed of requesting the web camera to deliver data representative of images taken before the alarm occurred, in the manner claimed. As described in column 6, lines 42-53, Seeley discloses "When an intruder is detected, SCU 12 performs a number of tasks. First the SCU acquires and stores a full resolution "snapshot" X of the event . . . Snapshots of the scene are taken at predetermined intervals _after_ an intrusion is detected" (emphasis added). This feature of Seeley is quite different from the present invention, where the images are taken _before_ the alarm occurred, and neither of Handa nor Kawai supplies the deficiencies of Seeley.

The combination of references further fails to teach or suggest "wherein in response to an instruction for seamless playback, a client terminal performs a reproduction step of receiving both of the first data and the second data of the overlapping period, selecting frames, frame by frame, from the first data and the

11

second data, and reproducing the selected frames along with the time stamps of the

selected frames as a continuous video,

wherein the reproduction step repeats:

a substep of adding an elapsed time from a reproducing start time to a

reproduction reference time;

a substep of updating a reproducing memory which holds a latest

acquired frame and a previous acquired frame for each of the first data and the

second data received from the storage server,

wherein the updating is performed when a time stamp of a latest

acquired frame of either the first data or the second data indicates a time older than

the reproducing reference time, by acquiring and receiving a next frame of the latest

acquired frame with the older time stamp; and

a substep of comparing the time stamps of the previous acquired

images of the first data and the second data to output either data as a reproducing

data, having a newer time, of the first data and the second data" as recited in claim

13, and as similarly recited in claim 20.

More specifically Seeley does not disclose the reproduction step, in the

manner claimed. As described in column 3, lines 15-25, Seeley provides where it is

not required to always establish a transmission path of a high frame rate and a high

quality video, and where it is required to establish the transmission path only under a

detection process or a recognition process. Further, regarding the high resolution

sample (Snapshots), as shown in Fig. 10, Snapshots and Thumbnails of video are

separately displayed on a quadrant 602b and a quadrant 602c, respectively.

However, Seeley does not disclose where the data is consolidated and reproduced

along with the time stamps as a continuous video (i.e., as a series of video data), in

the manner claimed. Likewise, the substeps of the "reproduction step" are also not

disclosed by Seeley, and the Handa and Kawai do not supply any of the deficiencies of Seeley.

With regard to claim 21, the combination of Seeley, Handa and Kawai fails to teach or suggest "outputs the last acquired image in the reproduced image memory for an alarm channel to a monitor if the difference is equal to or less than the continuation-decision value or the time stamp of the last acquired image in the reproduced image memory for the alarm channel is determined to be later".

The Examiner asserts that Handa discloses "information acquired by the time stamps and …" as claimed, citing column 5, lines 1-44. However, this description of Handa does not describe the "time stamps" as claimed.

With reference to column 6, lines 19-24, Handa discloses where time information is included in the still image, and the image accumulating server manages images in a photographed order. However, Handa does not disclose the reproduction as claimed. Inherently, Handa discloses how to record images into SDRAM (Fig. 3) in the web camera. Contrary to the Examiner's assertions, Handa does not teach or suggest the comparison of time stamps (for the record) of the normal recording and post-alarm recording (which would include the pre-alarm). In other words, since the post-alarm recording process would finish at a time when a storage area 42i is full, and the additional alarm recording process would finish after a user-defined time period expires, it is not necessary to compare time stamps in Handa. Thus, the present invention is quite different from Handa, and neither Seeley nor Kawai supplies the deficiencies of Handa.

Each of Seeley, Handa and Kawai suffer from the same deficiencies, relative to the features of the present invention, as recited in the claims. Therefore, combining the teachings of Seeley, Handa and Kawai in the manner suggested by the Examiner does not render obvious the features of the present invention as now

more clearly recited in the claims. Accordingly, reconsideration and withdrawal of the 35 U.S.C. §103(a) rejection of claims 13, 16-19 and 21 as being unpatentable over Seely in view of Handa, and further in view of Kawai are respectfully requested.

The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references used in the rejection of claims 13, 16-19 and 21.

In view of the foregoing amendments and remarks, Applicants submit that claims 13, 16-19 and 21 are in condition for allowance. Accordingly, early allowance of claims 13, 16-19 and 21 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of BRUNDIDGE & STANGER, P.C., Deposit Account No. 50-4888 (referencing Attorney Docket No. ASA-5444).

Respectfully submitted,

BRUNDIDGE & STANGER, P.C.

/DONNA K. MASON/
Donna K. Mason
Registration No. 45,962

DKM/kah
(703) 684-1470